

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND

IN RE:

PIERCE EDWARD VANLI

Debtor

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Case No.: 24-12715 LSS

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Chapter 13

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STATE EMPLOYEE CREDIT UNION  
971 Corporate Blvd.  
Linthicum, MD 21090

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Movant

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v.

PIERCE EDWARD VANLI  
14005 Hartley Hall Place  
Darnestown, MD 20874

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and

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TIMOTHY BRANIGAN, TRUSTEE  
9891 Broken Land Parkway, Suite 301  
Columbia, MD 20874

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Respondent(s)

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MOTION FOR RELIEF FROM AUTOMATIC STAY AS TO STATE EMPLOYEES CREDIT

UNION AS TO REAL PROPERTY KNOWN AS 14005 HARTLEY HALL PLACE,  
DARNESTOWN, MD 20874

STATE EMPLOYEE CREDIT UNION, Movant, by Candy L. Thompson,  
its attorney, files this Motion seeking Relief from Automatic Stay to Reclaim Property, and states:

1. This proceeding seeking relief under 11 U.S.C. §§ 362 and 1301 of the U.S. Bankruptcy Code is a contested matter within the meaning of 9014 and 4001 of the Federal Rules of Bankruptcy Procedure, and this court has jurisdiction over this matter pursuant to 11 U.S.C. § 157.
2. On April 1, 2024, Pierce Edward Vanli (“Debtor”), filed in this court a Petition under Chapter 13 of the United States Bankruptcy Code.
3. Timothy Branigan was appointed the Chapter 13 Trustee.
4. On or about November 30, 2012, the debtor (“Obligor”) executed and delivered a Note to

State Employees Credit Union (herein after “SECU”) in the amount of \$604,000.00, at the initial rate of 2.500% per annum, attorney’s fees, costs and late charges to be paid over thirty (30) years beginning January 1, 2013. An Adjustable Rate Rider was signed on or about November 30, 2012, providing that the initial interest rate could change on December 1, 2019, and every twelve (12) months thereafter. The current interest rate is 6.625%. A copy of the Note and Adjustable Rate Rider are attached as Exhibit A and incorporated herein.

5. To secure the repayment of the sums due under the Note, the Obligor executed and delivered to Deed of Trust which was assigned to SECU, dated November 30, 2012, and recorded among the land records of Montgomery County, Maryland, encumbering the real property (“Property”) known as: 14005 Hartley Hall Place, Darnestown, MD 20874. A copy of the Deed of Trust is attached as Exhibit B and incorporated herein.

6. As of April 9, 2025, the debtor owes an unpaid principal balance of \$713,155.66 under the Note, plus additional accruing interest, late charges, attorney’s fees and costs.

7. The Obligor has failed to make post-petition payments due under the Note, in the amount of \$80,171.72, plus additional late charges and attorneys’ fees and cost.

8. The Obligor is in default under the Note.

9. The Debtor has not and cannot offer SECU adequate protection of its interest in the Property, and SECU avers it is not adequately protected.

10. The Property is not necessary for an effective reorganization, as there is little or no equity in the property.

11. Debtor listed in his Chapter 13 plan his intention to pay SECU for pre-petition arrears, and directly for post-petition payments. A copy of the Chapter 13 Plan is attached as Exhibit C and incorporated herein.

12. Cause exists to terminate the Automatic Stay.

**NOTICE OF INTENT TO SUBMIT BUSINESS RECORDS**

Creditor will submit business records as evidence at any scheduled hearing, as allowed under Fed. R. Bankr. P. 9017 and FRE 902(11). These business records are available for inspection by the adverse party upon demand.

WHEREFORE, the premises considered, SECU, respectfully requests that this Court enter an Order terminating the Automatic Stay allowing SECU to exercise its legal rights under applicable state law as to the Property, including but not limited to foreclosure against the Property under the Deed of Trust, and for such other and further relief this court deems just and proper including its attorneys' fees, expenses and cost.

/s/ Candy L. Thompson  
Candy L. Thompson, Esquire  
Candy L. Thompson, LLC  
Trial Bar No. 024010  
Suite 804  
201 North Charles Street  
Baltimore, Maryland 21201  
(410)385-2626

**CERTIFICATE OF SERVICE**

I hereby certify that on the 11 Day of April, 2025, I reviewed the Court's CM/ECF system and it reports that an electronic copy of the Notice, Exhibits, and Motion for Relief will be served electronically by the Court's CM/ECF system on the following:

Timothy P. Branigan  
Chapter 13 Trustee  
9891 Broken Land Parkway,  
Suite 301  
Columbia, MD 21046  
cmecl@chapter13maryland.com

Victor Palmeiro, Esquire  
Palmeiro Law Group

5882 Hubbard Drive  
Rockville, MD 20852  
victorpalmeiro@gmail.com

I hereby further certify that on the 11 Day of April, 2025, a copy of the Notice, Exhibits, and Motion were also mailed first class mail, postage prepaid to:

Pierce Edward Vanli  
14005 Hartley Hall Place  
Darnestown, MD 20874  
Debtor

/s/ Candy L. Thompson  
Candy L. Thompson, Esquire